

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

-----X

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA  
Title III

as representative of

No. 17 BK 03283-LTS

THE COMMONWEALTH OF PUERTO RICO, *et al.*

(Jointly Administered)

Debtors.<sup>1</sup>

-----X

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA  
Title III

as representative of

No. 17 BK 03566-LTS

THE EMPLOYEES RETIREMENT SYSTEM  
OF THE GOVERNMENT OF THE  
COMMONWEALTH OF PUERTO RICO (ERS).

Debtor.

-----X

**JOINDER OF THE AMERICAN FEDERATION OF STATE, COUNTY AND  
MUNICIPAL EMPLOYEES TO (1) THE OBJECTION OF THE OFFICIAL  
COMMITTEE OF RETIRED EMPLOYEES OF THE COMMONWEALTH OF  
PUERTO RICO TO THE ERS BONDHOLDERS' MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY AND (2) DEBTOR'S OPPOSITION TO MOTION OF  
CERTAIN SECURED CLAIMHOLDERS OF EMPLOYEES RETIREMENT SYSTEM  
OF GOVERNMENT OF COMMONWEALTH OF  
PUERTO RICO FOR RELIEF FROM AUTOMATIC STAY**

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474).

The American Federation of State, County and Municipal Employees (“AFSCME”) hereby joins the *Objection of the Official Committee of Retired Employees of the Commonwealth of Puerto Rico to the ERS Bondholders’ Motion for Relief from the Automatic Stay* [Case No. 17-3283-LTS, Docket No. 3467; Case No. 17-3566-LTS, Docket No. 293] (the “Retiree Committee Objection”) and the *Debtor’s Opposition to Motion of Certain Secured Claimholders of Employees Retirement System of Government of Commonwealth of Puerto Rico For Relief From Automatic Stay* [Case No. 17-3283-LTS, Docket No. 3465; Case No. 17-3566-LTS, Docket No. 292] (the “FOMB Objection”).

WHEREFORE, for the reasons set forth in the Retiree Committee Objection and the FOMB Objection, AFSCME respectfully requests that the Court deny the *Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Relief from the Automatic Stay* [Case No. 17-3283-LTS, Docket No. 3418; Case No. 17-3566-LTS, Docket No. 289] and grant such other relief as may be just.

Dated: July 10, 2018

**SAUL EWING ARNSTEIN & LEHR LLP**

By: /s/ Sharon L. Levine  
Sharon L. Levine (*pro hac vice*)  
Dipesh Patel (*pro hac vice*)  
1037 Raymond Blvd.  
Suite 1520  
Newark, NJ 07102  
(973) 286-6713 (Telephone)  
(973) 286-6821 (Facsimile)

-and-

/s/ Matthew S. Blumin  
**AMERICAN FEDERATION OF STATE,  
COUNTY AND MUNICIPAL EMPLOYEES**  
Judith E. Rivlin (*pro hac vice*)  
Teague P. Paterson (*pro hac vice*)  
Matthew S. Blumin (*pro hac vice*)  
1101 17th Street NW, Suite 900

Washington, DC 20011  
(202) 775-5900 (Telephone)  
(202) 452-0556 (Facsimile)

-and-

/s/ Manuel A. Rodriguez Banchs

Manuel A. Rodriguez Banchs  
P.O. Box 368006  
San Juan, Puerto Rico 00936-8006  
(787) 764-8896 (Telephone)  
(787) 721-0975 (Facsimile)

*Attorneys for the American Federation of State,  
County and Municipal Employees*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

Dated: July 10, 2018

/s/ Sharon L. Levine

Sharon L. Levine